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March 17, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: CC Docket No. 96-45
WC Docket Nos. 06-54 & 06-55
CC Docket No. 80-286
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On March 16, 2006, Douglas Meredith and John Kuykendall of John Staurulakis, Inc. ("JSI") met via teleconference with Ian Dillner in Chairman Kevin Martin's office on behalf of JSI's rural local exchange carrier clients. In the meeting, the JSI representatives discussed the status of appeals filed by three JSI clients seeking reversal of decision by the Universal Service Administrative Company to significantly reduce the companies' Safety Net Additive Support (CC Docket No. 96-45).

The JSI representatives also notified Mr. Dillner that JSI and other parties would be filing petitions seeking extensions of the comment cycle established by the Commission on two petitions filed by Time Warner Cable (WC Docket Nos. 06-54 & 06-55). The representatives explained that the 21-day comment cycle was too short given the complex issues raised in the proceedings and urged the Commission to grant an additional 30 days for filing initial comments.

A final item that was discussed was the proposed extension of the jurisdictional separations freeze (CC Docket No. 80-286). JSI expressed its support for a continuation of the separations freeze for rural carriers. JSI addressed one mechanical issue related to the current freeze period. Under 47 CFR § 36.125 a study area whose access lines increase over a DEM factor threshold move to a lower DEM factor for the remainder of the current freeze period. However, for study areas whose access lines decrease to a level below a DEM factor threshold, the current rule does not permit moving to a higher DEM factor for the remainder of the current freeze period. These factors are used to calculate Federal High-Cost Local Switching Support. JSI recommends that the Commission recognize this imbalance and require all carriers to reset their DEM factor based on current access lines. For purposes of extending the freeze period, JSI

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recommends the Commission permit carriers to adjust their DEM factor prior to extending the factor freeze period.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ John Kuykendall

John Kuykendall
Director – Regulatory Affairs

cc: Ian Dillner